

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Anti-Age Technologies, LLC)	
)	
v.)	Case No. 19-cv-26
)	
THE PARTNERSHIPS and)	Judge:
UNINCORPORATED ASSOCIATIONS)	
IDENTIFIED ON SCHEDULE "A,")	Magistrate:
)	
)	
)	
_____)	

PLAINTIFF’S MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff Fairly Anti-Age Technologies, LLC files this Motion requesting leave to file the following documents under seal: (1) Plaintiff’s Complaint, which lists the Online Marketplace Accounts identified in Schedule A (collectively, the “Defendant Internet Stores”); (2) Schedule A attached to the Complaint, which includes a list of the Defendant Internet Stores; and (3) screenshot printouts showing the active Defendant Internet Stores (Exhibit 2 to the Declaration of David Gulbransen). In this action, Plaintiff is requesting temporary *ex parte* relief based on an action for trademark infringement and counterfeiting, false designation of origin, and violation of the Illinois Uniform Deceptive Trade Practices Act.

Sealing this portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence and the hiding or transferring of assets to foreign jurisdictions, which would frustrate the purpose of the underlying law and would interfere with this Court’s power to

grant relief. Once the temporary restraining order has been served on the relevant parties and the requested actions are taken, Plaintiff will move to unseal these documents.

Respectfully submitted,

By: s/David Gulbransen/
David Gulbransen
Attorney for Plaintiff

David Gulbransen (#6296646)
Law Office of David Gulbransen
805 Lake Street, Suite 172
Oak Park, IL 60302
(312) 361-0825 p.
(312) 873-4377 f.
david@gulbransenlaw.com